

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

HELENA AGRI-ENTERPRISES, LLC,

CASE NO. 1:18-CV-00963-RJJ-RSK

Plaintiff,

Honorable Chief Judge Robert J. Jonker

v.

GREAT LAKES GRAIN, LLC; BOERSEN FARMS AG, LLC, A MICHIGAN LIMITED LIABILITY COMPANY, BOERSEN FARMS, INC. A MICHIGAN CORPORATION, BOERSEN AG PARTNERS, LLC, A MICHIGAN LIMITED LIABILITY COMPANY, DENNIS BOERSEN, ARLAN BOERSEN, SANDRA BOERSEN,

Defendants.

**PLAINTIFF'S MOTION TO COMPEL
BOERSEN DEFENDANTS TO EXECUTE
AUTHORIZATIONS REQUIRED FOR
PRODUCTION OF DOCUMENTS
SUBPOENAED FROM GREAT
AMERICAN INSURANCE GROUP**

ORAL ARGUMENT REQUESTED

**EXPEDITED CONSIDERATION
REQUESTED**

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Plaintiff Helena Agri-Enterprises, LLC ("Helena" or "Plaintiff"), by its counsel, hereby moves the Court to compel the Boersen Defendants to execute the authorizations required for production of documents subpoenaed from Great American Insurance Group. Helena submits the accompanying brief in support of this motion.

Pursuant to LCivR 7.3(d), Plaintiff requests that this Court set this Motion for oral argument.

In accordance with LCivR 7.1(d), the undersigned counsel contacted Defendants' counsel requesting agreement in this motion, and the request was denied.

WHEREFORE, Plaintiff Helena Agri-Enterprises, LLC. respectfully requests that this Court (1) grant its Motion and compel Defendants to execute the authorizations necessary for Plaintiff to obtain documents from Great American Insurance Group; (2) grant leave for Plaintiff to extend the discovery deadline for the purpose of obtaining documents from Great American Insurance Group if its Motion to Amend the Third Case Management Order is denied and for any additional discovery that is necessary based on its review of those documents; and (3) grant such further relief as the Court deems just.

Dated: March 2, 2020

Respectfully submitted,

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